



INTERVENTION

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2003 JAN 16 P 4: 27

AZ CORP COMMISSION
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Arizona Corporation Commission
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JAN 16 2003

IN THE MATTER OF THE JOINT APPLICATION)
OF CITIZENS COMMUNICATIONS COMPANY)
AND UNISOURCE ENERGY CORPORATION)
FOR THE APPROVAL OF THE SALE OF)
CERTAIN ELECTRIC UTILITY AND GAS UTILITY)
ASSETS IN ARIZONA, THE TRANSFER OF)
CERTAIN CERTIFICATES OF CONVENIENCE)
AND NECESSITY FROM CITIZENS)
COMMUNICATIONS COMPANY TO UNISOURCE)
ENERGY CORPORATION, THE APPROVAL OF)
THE FINANCING FOR THE TRANSACTIONS)
AND OTHER RELATED MATTERS.)

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) DOCKET NO. E-01933A-02-0914
) DOCKET NO. E-01032C-02-0914
) DOCKET NO. G-01032C-02-0914

Application for Leave to Intervene

Pursuant to A.A.C. R-14-3-105 and for the reasons that follow, Southwest Gas Corporation ("Southwest") respectfully applies for an Order granting Southwest leave to intervene in the above-captioned proceeding.

Southwest is a public service corporation within the contemplation of § 2 of Article XV of the Arizona Constitution, and Southwest is certificated by the Commission to provide natural gas service in that capacity throughout various areas within the state of Arizona. Further, as a public service corporation, Southwest is subject to the jurisdiction of the Commission, and acquisitions and sales of utility assets by Southwest are subject to prior approval of the Commission in proceedings such as the above-captioned proceeding.

As a practical matter, Commission policies and precedent regarding the acquisition and sale of utility assets, such as ratemaking treatment in particular, are formulated and modified from time to time in the context of proceedings such as the above-captioned proceeding. It is for that reason, *inter alia*, that Southwest has a direct and substantial interest in the proceeding. More specifically, Southwest currently is a party to a pending proceeding [Docket No. G-1551A-02-0425] involving the acquisition by Southwest of Black Mountain Gas Company, a public service corporation subject to the jurisdiction of the Commission.

Southwest's intervention would not result in having the issues in the above-captioned proceeding unduly broadened for the reason that Southwest's participation would be limited solely to issues bearing directly on the acquisition and sale of utility assets.

Southwest requests that communications in connection with this proceeding be directed to:

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RESPECTFULLY SUBMITTED this 16th day of January, 2003.



Andrew W. Bettwy
Assistant General Counsel
Southwest Gas Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **Application for Leave to**

Intervene by faxing/mailling/delivering a copy thereof to each of the following individuals:

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Dated this 16th day of January, 2003

A handwritten signature in black ink, appearing to read "Andrew W. Bettwy", is written over a horizontal line.

Andrew W. Bettwy